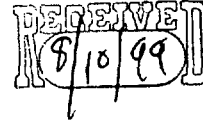


# PREMIER DIRECT INC.

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July 27, 1999

Office of Special Nutritionals (HFS-450)  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
200 C Street, SW  
Washington, D.C. 20204

RE: 21 U.S.C. Section 343(r)(6) Notification of Statements on Dietary Supplements


Dear Sir/Madam:

I hereby notify the Food and Drug Administration ("FDA") of the use of statements of nutritional support in the labeling of GH-Life, a dietary supplement. Premier Direct, Inc. is a manufacturer of GH-Life.

## Statements Being Made in the Labeling of GH-Life

- (1) keeping our bodies and minds sharp
- (2) Magnesium: help calcium build strong bones ... you cannot metabolize the essential nutrients, vitamin C, phosphorus, sodium, potassium and numerous enzymes without magnesium.
- (3) Ginkgo Biloba: Promotes healthy arteries, veins and capillaries in the heart and circulatory system.  
... ginkgo helps boost memory retention, alertness and mental clarity.
- (4) Choline: choline helps to support memory, cell membranes in the brain, and acts like a detoxifier.
- (5) Superoxide Dismutase (S.O.D.): This is the most powerful of all the body's antioxidant enzymes, and its primary job is to fight off cell-destroying free radicals.
- (6) cobalamin is the key to fighting fatigue, boosting energy and supporting ear health.  
[cobalamin] ... ability to regulate homocysteine levels in your blood.

To the best of my knowledge, and based upon information and belief present at the time of executing this notice, I certify that this information is accurate and complete and Premier Direct, Inc. possesses substantiation that the statements are truthful and not misleading.

  
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